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Regulatory Analysis and Development PPD, APHIS, Station 3C71  
4700 River Road Unit 18  
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Gentlemen:

It has come to my attention that you are developing a mandatory system for identifying animals produced on the farms and ranches of The United States. ~~It escapes me as to how this will~~ benefit me as a producer of cattle on my farm. In my life time (age 65) the total number of cattle that have come onto this farm other than bulls could be counted on my fingers. Therefore, the probability of me having disease problems in my herd due to cattle coming onto the premises is so small as to be ignored. I worry more about creek water and birds spreading disease.

One would hope that if such a program for identification of animals is mandated it has a perceived benefit to somebody. When it comes to allocating the cost of compliance, that beneficiary should be the one to bear the cost of that identification. The producer should also be allocated a payment to cover his reasonable cost of compliance. In the case of animals for food that payer should obviously be the consumer of the meat.

As to method of identification, it should be part of the regulation that the use of a registered brand in any state should be adequate. Since the beginning of the Illinois Department of Agriculture administering the registration of brands and in each subsequent expiration period I have maintained a brand registration. This brand is presumed fact of proof of ownership, is unique within the State of Illinois, is permanent and easily seen on the animal. My practice is to also tattoo an upper case S and a unique number coding age in each animal's ears. By any reasonable logic this should be adequate for compliance. Should the animal be transported out of the state it should be up to the transporter to add any necessary other marking should that animal be transported into a state having an identical brand.

This brand has a benefit to me in that my neighbor is a large producer of cattle and those two herds are separated by a single fence row. Should cattle become mixed up it allows me to identify my animals. It is also protection from theft. Therefore I have no problem with bearing the cost of placing that brand on my cattle.

At my age, I will tell you that if I am required to bear the cost of any additional identification of animals I produce, I will quit raising cattle for the commercial market.

Sincerely yours,

David L. Snider

cc: Ray LaHood, Richard Durbin, Barrak Obama

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